

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CASE NO. 1:14-CV-954**

**STUDENTS FOR FAIR ADMISSIONS,
INC.,**

Plaintiff,

v.

**UNIVERSITY OF NORTH CAROLINA
et al.,**

Defendants.

**PLAINTIFF'S FOURTH AMENDED OBJECTIONS AND RESPONSES TO
DEFENDANTS' FIRST COMBINED DISCOVERY REQUESTS TO PLAINTIFF**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, and Local Rule 26.1, Plaintiff Students for Fair Admissions, Inc. ("SFFA") submits the following objections and responses to the Defendants' (collectively "UNC-Chapel Hill") First Combined Discovery Requests to Plaintiff, dated June 11, 2015.

GENERAL OBJECTIONS

SFFA makes the following general objections to UNC-Chapel Hill's First Combined Discovery Requests to Plaintiff, which apply to each request regardless of whether the general objections are specifically incorporated into the specific objections below.

1. SFFA objects to each request to the extent it calls for information that is protected from discovery by the attorney-client privilege or the work product doctrine, or that are otherwise protected from disclosure under the Federal Rules of Civil Procedure, the Federal Rules of Evidence, and the relevant statutory or case law. Inadvertent

EXHIBIT I

CONFIDENTIAL

SPECIFIC OBJECTIONS AND RESPONSES TO INTERROGATORIES

Interrogatory No. 1:

Identify all persons with knowledge or information regarding the facts and circumstances at issue in this case, including without limitation (i) the allegations in the Complaint; and (ii) any claims or defenses raised by any party. For each person you identify, summarize the facts and circumstances about which he or she has knowledge or information.

Response to Interrogatory No. 1:

SFFA objects to this interrogatory as overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence to the extent it requests SFFA to identify any person with any "knowledge" of the very broad, generalized topics identified in this request. SFFA further objects to the extent the request is vague in referring to non-specific "claims or defenses raised by any party." SFFA has in excess of 22,000 members and maintains a public website; it is impossible and burdensome to list every single person who may have some knowledge on the requested topics. SFFA further objects to this interrogatory to the extent it seeks privileged information, including information protected from disclosure by the attorney-client or attorney work product privileges. Moreover, SFFA objects to the extent this request calls for information about people who are not affiliated with SFFA and/or are identified by name in the Complaint.

Subject to and without waiving its objections, SFFA responds as follows: The following people have knowledge or information regarding the facts and circumstances at issue in this through their participation in SFFA.

- Edward Blum, President and Board Member of SFFA. Mr. Blum is responsible for SFFA's launch, its day-to-day operations, membership recruitment, and efforts

Interrogatory No. 5:

Identify the name of any Person or entity that has made or provided any form of contribution or donation, whether in the form of cash, property, or any other form, to SFFA since its inception.

Response to Interrogatory No. 5:

SFFA objects to this interrogatory as overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence. The breadth of this request infringes the First Amendment right to associational privacy of SFFA and its members and former members.

Subject to and without waiving its objections, and pursuant to the parties' agreement regarding the deposition of Mr. Blum, SFFA responds as follows: As of November 1, 2017, SFFA has received [REDACTED]

[REDACTED]. SFFA also has received [REDACTED]
[REDACTED]. Anonymity in donations

is important to SFFA's members and supporters, particularly in light of their concerns about the potential for retaliation in the admissions process against individuals and family members who wish to apply for admissions in the future.

Interrogatory No. 6:

Identify the full name, contact information, and race or ethnicity of the Applicant referenced in paragraph 13 of the Complaint, all Future Applicants referenced in paragraph 21 of the Complaint, and all Parents referenced in paragraph 23 of the Complaint.

Response to Interrogatory No. 6:

SFFA objects to this request as overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence, to the extent it seeks information about "all" Future Applicants and "all" Parents; SFFA's membership is